

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and HTA.

ORDER GRANTING FOUR HUNDRED SEVENTY-NINTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF
PUERTO RICO AND THE PUERTO RICO HIGHWAYS AND TRANSPORTATION
AUTHORITY TO DEFICIENT CLAIMS

Upon the *Four Hundred Seventy-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Deficient Claims* [ECF No. 21430] (the “Four Hundred Seventy-Ninth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Highways and

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Seventy-Ninth Omnibus Objection.

Transportation Authority (“HTA,” and together with the Commonwealth, the “Debtors”), dated July 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Seventy-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Seventy-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Seventy-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Deficient Claims” in Exhibit A to the Four Hundred Seventy-Ninth Omnibus Objection (collectively, the “Deficient Claims”) having failed to comply with the applicable rules by not providing a valid basis for the claim, such that the Debtors cannot determine the validity of the claim; and the Court having determined that the relief sought in the Four Hundred Seventy-Ninth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Seventy-Ninth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Seventy-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Deficient Claims are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to delete the Deficient Claims from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21430 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Seventy-Ninth Omnibus Objection

Four Hundred Seventy-Ninth Omnibus Objection

Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ALVERIO DEL TORO, PROVIDENCIA 60 CALLE SANTIAGO IGLESIAS APT. 426 SAN LORENZO, PR 00754	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	119984	\$6,919.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
2	AMOR A LA FAMILIA INC AKN COOP AMOR A LA TERCERA EDAD PO BOX 6932 BAYAMON, PR 00960	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	39991	\$304,564.72
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
3	BIGIO ROMERO, ARCADIO LCDA. EVA BIGIO AGOSTO MSC 112, URB. LA CUMBRE 273 SIERRA MORENA SAN JUAN, PR 00926	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	78028	\$46,172.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
4	CARIBBEAN TEMPORARY SERVICES, LLC PO BOX 11873 SAN JUAN, PR 00910-1873	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	33154	\$128,084.01
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					

Four Hundred Seventy-Ninth Omnibus Objection

Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	CINTRON ORTIZ, IRVIN E. CIUDAD JARDIN JUNCOS 54 CALLE DAGUAO JUNCOS, PR 00777	03/02/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	617	\$52.80*
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
6	INTELUTIONS, INC. PMB 367 35 CALLE JUAN BORBON SUITE 67 GUAYNABO, PR 00969	05/02/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	8862	\$12,450.00
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
7	LUCIE OLIVO RENTAL PUERTO NUEVO 369 CALLE BALEARES SAN JUAN, PR 00920-4010	06/06/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	48758	\$500.00
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
8	NIEVES MORALES, CARMEN M. 130 CALLE GORRION CHALETES DE BAIROA CAGUAS, PR 00727	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	79915	\$21,600.00
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						

Four Hundred Seventy-Ninth Omnibus Objection

Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
9	ORTIZ RIVERA III, EDWIN PO BOX 305 COAMO, PR 00769	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	32889	\$201.85
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
10	RITZ, PIZARRAS PROVIDENCIA ALVERIO DBA PIZARRA RITZ BOX 426 SAN LORENZO, PR 00754	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	119067	\$900.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
11	RIVERA, CECILIA GARCIA PO BOX 13071 SAN JUAN, PR 00908	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	48828	\$12,000.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
12	SOCIEDAD ESPECIAL DE PLAZA HATO ARRIBA PO BOX 3005 SAN SEBASTIAN, PR 00685	03/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	3319	\$23,640.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					

Four Hundred Seventy-Ninth Omnibus Objection

Exhibit A - Deficient Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
13	TIRADO MOREIRA, NORA 166 CALLE UNION FAJARDO, PR 00738	06/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	99643	\$1,000.00
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
14	TRULY NOLEN PEST CONTROL & PREV URB STA JUANITA PMB 229 UUI CALLE 39 BAYAMON, PR 00956	06/05/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	46233	\$9,156.25
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					
15	TRULY NOLEN PEST CONTROL & PREVENTION, INC PMB 229 UU 1 CALLE # 39 SANTA JUANITA BAYAMON, PR 00956	06/05/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	33244	\$3,165.00
	Reason: Proof of claim purports to assert liabilities associated with the Puerto Rico Highways and Transportation Authority, but fails to provide sufficient supporting documentation for asserting a claim against the Puerto Rico Highways and Transportation Authority, such that the Debtors are unable to determine whether claimant has a valid claim against the Puerto Rico Highways and Transportation Authority or any of the other Title III debtors.					
16	ZORRILLA AUTO STORE PO BOX 362367 SAN JUAN, PR 00936-2367	03/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	3403	\$49,554.37
	Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.					

Four Hundred Seventy-Ninth Omnibus Objection

Exhibit A - Deficient Claims

NAME		DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
17	ZORRILLA COMMERCIAL CORP PO BOX 362367 SAN JUAN, PR 00936-2367	03/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	3401	\$15,082.50
Reason: Proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but fails to provide sufficient supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
					TOTAL	\$635,042.50*